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12 Attorneys for Plaintiff

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

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UNITED STATES OF AMERICA,	CR No. 07-0454 PJH
Plaintiff,	STIPULATION AND [PROPOSED] ORDER
v.	EXCLUDING TIME UNDER 18 U.S.C. § 3161
SHANNON BLAYLOCK,)
aka ARLANDYS RICHARDSON,)
aka "DADDY RICH",)
TAWAKONI SEATON,)
aka TONI, and)
LATOSHA GARDNER,)
Defendant.)

On March 26, 2008, the parties in this case appeared before the Court and stipulated that time should be excluded from the Speedy Trial Act calculations for co-defendant Gardner from March 26, 2008 through April 9, 2008 and for co-defendants Blaylock and Seaton from March 26, 2008 through April 30, 2008. The parties represented that granting the continuance was

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STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME, 07-0454 PJH

1 necessary for effective preparation of counsel, taking into account the exercise of due diligence.

2 See 18 U.S.C. § 3161(h)(8)(B)(iv).

3 SO STIPULATED:

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5 JOSEPH P. RUSSONIELLO
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8 United States Attorney

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10 DATED: April 30, 2008

11 /s/ Denise Barton
12 DENISE MARIE BARTON
13 Assistant United States Attorney

14 DATED: April 30, 2008

15 /s/
16 MICHAEL STEPANIAN
17 Attorney for SHANNON BLAYLOCK

18 DATED: April 30, 2008

19 /s/
20 KENNETH WINE
21 Attorney for TAWAKONI SEATON

22 DATED: April 30, 2008

23 /s/
24 JODI LINKER
25 Attorney for LATOSHA GARDNER

1 [Proposed] Order

2 As the Court found on March 26, 2008 and for the reasons stated above, the Court finds that
3 the ends of justice served by the continuance outweigh the best interests of the public and the
4 defendants in a speedy trial and that time should be excluded from the Speedy Trial Act
5 calculations time should be excluded from March 26, 2008 through April 9, 2008 for co-
6 defendant Gardner and from March 26, 2008 through April 30, 2008 for co-defendants Blaylock
7 and Seaton for effective preparation of counsel. See 18 U.S.C. §3161 (h)(8)(A). The failure to
8 grant the requested continuance would deny counsel reasonable time necessary for effective
9 preparation of counsel, taking into account the exercise of due diligence, and would result in a
10 miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

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12 SO ORDERED.

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14 DATED: _____

15 HONORABLE. PHYLLIS J. HAMILTON
United States District Judge